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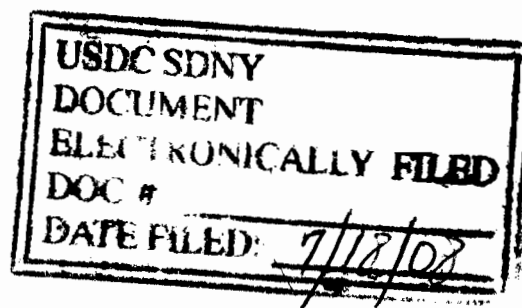
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July 17, 2008

Barbara M. Roth
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BY HAND DELIVERY

The Honorable Theodore H. Katz
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1660
New York, New York 10007



**Re: Lizarraga v. Calyon Securities (USA), Inc.
08 Civ. 01732 (RMB) (THK)**

Dear Judge Katz:

We represent defendant Calyon Securities (USA), Inc. We write, with the agreement of plaintiff's counsel, to jointly request that Your Honor extend the discovery deadline from July 31, 2008 to October 15, 2008. There has been no prior request to change the discovery deadline.¹

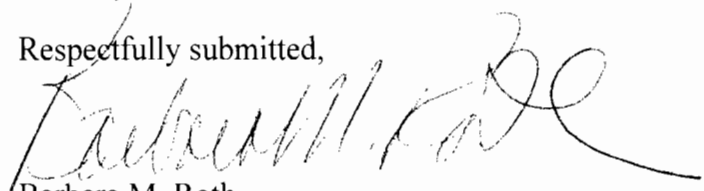
Though the parties have proceeded in good faith to fulfill their discovery requirements, a number of issues have arisen – some of which were discussed by counsel at the very outset of the case. First, defendant accurately predicted that computer search problems would make it impossible to complete all necessary document searches as quickly as desired – which necessitated an extension of the date for responding to written discovery. Second, three of the deponents whom plaintiff has requested are not employees of the defendant (and thus are not under defendant's control) and are located in France. We are informed by partners in this firm's Paris office that under French law, such individuals cannot be required to give depositions – and, indeed, that French law does not countenance such proceedings. We have made efforts, therefore, to obtain the voluntary cooperation of certain deponents and to bring them to New York for depositions, but those efforts are still in process and are causing serious scheduling difficulties. Finally, plaintiff recently propounded additional discovery requests, to which defendant is in the process of responding.

¹We note that Your Honor did grant the parties' request to extend the dates for responding to document requests and interrogatories.

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Both parties would appreciate Your Honor's extension of the discovery deadline so that discovery can be completed in a collegial and orderly manner.

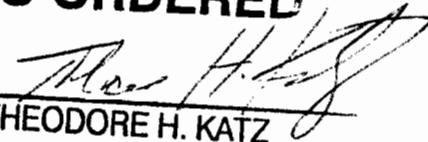
Respectfully submitted,


Barbara M. Roth

cc: David Greenberger, Esq.
Andrea M. Paparella, Esq.

*The deadline for completion of
discovery is extended to October 15, 2008.
By no later than September 15, 2008 to
parties should agree in good faith
settlement discussions and advise the Court
if and when court assistance would be
needed.*

SO ORDERED

7/18/08 
THEODORE H. KATZ
UNITED STATES MAGISTRATE JUDGE